Reclamation District No. 2086

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March 6, 2003

Ms. Gwen Knittweis Mr. Paul Bowers North Delta Improvements Project California Department of Water Resources P.O. Box 942836 Sacramento, CA 94236-0001

Re: North Delta Improvements Project

Public Scoping Meeting, February 19 & 20, 2003

Dear Gwen & Paul,

On behalf of Reclamation District No. 2086, Canal Ranch, I would like to submit the following comments relative to the North Delta Improvements Project, EIR/EIS Public Scoping Meetings. It was indicated at both meetings that comments from knowledgeable individuals with an understanding of the area was of particular interest. Accordingly, I have also provided a brief background on my experience with Delta water and Flood Control issues.

ISSUES

☐ Historically, the fundamental flood dynamics have not changed, and the solution principals, from a flood control aspect, remain the same. The difficulty in developing a solution comes from more recent changes in environmental needs and legal issues, development issues in South Sacramento County, the creation and development of CALFED, and it's taking over of the program. Funding for this program has always been an underlying issue.

CONCERNS

☐ EIR/EIS

- The EIR/EIS becomes the springboard for the much needed improvements needed in the North Delta region
- Release of an EIR/EIS that does not adequately detail alternatives that have met the test of stakeholder review has the potential to result in delays at the time of implementation. (lawsuits, political issues, internal bickering between agencies and stakeholders)

Modeling

 Past efforts in finding solutions to flood issues were made difficult, as a good hydraulic model did not exist. We now have a good model that can

- be used to measure the effects of various solutions on the affected stakeholders.
- Several alternatives that include long term "worst case" scenarios need to be run through the model with input provided by the affected stakeholders. (global warming, 100 & 200 year events, massive upstream improvements that would cause more water to come down the Cosumnes etc).
- The scenarios must be realistic and be run without artificial inputs that could skew the results to favor one stakeholder over another.
- All scenarios must include solutions and modeling to the area well within the "Delta Pool" area of the delta.
- o For staged work, the scenarios must be run with all downstream work occurring first and associated modeling included. To force flows and associated impacts downstream is contrary to well designed flood control projects. Moving the bottleneck does not relieve flood issues, and in the delta, the lower in elevation you move the problem, a higher chance of levee failure occurs, Additionally, water quality impacts may be greater due to higher degree of salt intrusion.
- The scenarios should not be biased for political, environmental, or cost considerations. All stakeholders understand that some sacrifices will need to be made to provide a benefit to the system. Also, other alternatives may become apparent as a result.
- Once the best flood solutions are achieved, alternative selection can take place.

☐ Environmental

- Once a suite of flood control alternatives are achieved, CALFED ecosystem restoration components can be added as necessary, and the resulting effects to the flood control can be modeled and adjusted for accordingly.
- O Dredging has become a controversial issue due to a fundamental misunderstanding about the natural processes in the delta. The delta is an engineered system. It has been drastically manipulated since prior to the gold rush and hydraulic dredging and levee construction drastically altered the area for the last 100 years plus. Issues regarding natural channel processes and flow regimes do not apply in the delta. We are essentially the toilet bowl for the entire Central Valley, and as such, cleaning needs to take place on a regular basis to maintain a healthy system. An example of this is the exotic vegetation growth that takes place in areas that historically had deeper water and have now silted up from upstream sediment migration caused by floods and various types of development (housing, agricultural, infrastructure etc.) Once an environmentally acceptable process can be developed, routine maintenance dredging should be considered as a cost effective and beneficial practice.

 Discussions with Biologists familiar with the Delta agree that this is a real

- possibility. Dredging should be actively explored as an alternative and immediate research should be initiated.
- The impacts of Boating should be further explored. The current research seems to be skewed, and does not fully account for the impacts that we know is happening to both the environment and

SOLUTIONS

		tive input from stakeholder representatives should be sought prior to including alternative into the EIR/EIS.	
		ternatives must be identified in the EIR/EIS, along with anticipated adaptive magement potentials and solutions.	
		ood control needs to be addressed first. Water conveyance should, almost comatically, benefit from better flood carrying capacity increases.	
	env	Once the stakeholders agree upon acceptable flood control alternatives, environmental components should be added that do not detract from the flood control and water conveyance benefits.	
	In order to meet the deadlines envisioned for this project, funding to accelerate modeling of alternatives and stakeholder scoping needs to be made available immediately.		
W.G. DARSIE PERSONAL BACKGROUND			
		BS degree in Agronomy (plant and soil science), Minor in Biology	
		3 rd generation delta farmer, born and raised in Walnut Grove, personally operated Canal Ranch and Egbert Ranch for 15 years (4700 acres) plus assisted in management of additional 7000 acres in the delta and other areas in California).	
		Have been a trustee of multiple Reclamation Districts and other Special Districts	
		10 years as private consultant managing agricultural properties and reclamation districts	
		Director of California Central Valley Flood Control Association for over 10 years	
		Currently working as a senior assistant engineer / project manager with Kjeldsen, Sinnock and Neudeck, Inc., a Stockton based consulting engineering and land survey firm representing numerous Delta interests	
		Have been personally involved with every major Delta flood event since 1964	
		Have been actively involved in North Delta solutions since 1986 when the North Delta Program was initiated by DWR under the direction of Stein Buer	

I appreciate the opportunity to provide comments and welcome any questions that you might have. Please do not hesitate to call if you should have any questions.

Sincerely,

RECLAMATION DISTRICT NO. 2086

William G. Darsie, Trustee/Secretary

cc: Trustees

Gilbert Cosio, Jr.